IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

APPEAL BRIEF		
Application No. 10/587,890	Filing Date 07/31/2006	First Named Inventor Feng Lin
Examiner SUNIL CHACKO	Art Unit 2625	For INTERNET PRINTING
Brief fee: Form PTO-2038 of $270 is enclosed		

(i) Real party in interest

Feng Lin and Ling Su (Applicants)

(ii) Related appeals and interference

There are no related appeals and interferences.

(iii) Status of claims

Rejected Claims: 1-8

Cancelled Claims: 1-5

Claims Appealed: 6-8

(iv) Status of amendments

No amendment filed subsequent to final rejection.

(v) Summary of claimed subject matter

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(vi) Grounds of rejection to be reviewed on appeal

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(vii) Argument

1. Examiner's Advisory Action

We quote the Advisory Action, and strikethrong the parts, which we think are wrong, and add comments [1] - [3].

Advisory Action: ... disagrees, Claim 6 is not claiming that the Web Server has a "direct" connection to the Printer. The language of the claim states that "Second server via the Internet sends information to the printer". The Examiner interprets ~~the first server or~~ [1, 2a] proxy server is part of the ~~internet~~ [3] and the second server sends the information to the printer via the ~~first~~ [1, 2a] proxy server ~~(internet)~~ [3]. Hence, the language of Claim 6 still be read as ~~Diagram 1~~ [2b]. Therefore, the Examiner maintains the Final Action.

[1] People skilled in the art know that, based on the network configuration, printer can either make a "direct" connection to Web server, or make an "indirect" connection to Web server via a local proxy. In "direct" connection, data is sent from Web server to printer; and in "indirect" connection, data is sent from Web server to proxy that forwards it to printer. So it is not necessary that there have to be a proxy. That Examiner interprets first server as a proxy is not necessary for claim 6 to function.

Claim 6 has "second retrieve means for ... retrieving said document from said second server via Internet;" Proxy is a known technology and is hidden under the language. Though we may say there is a proxy in most cases, it is not necessary that first server must be the proxy.

Following Diagrams 2B shows claim 6 in a network with proxy server. You can see the location of proxy in the Diagram 2B.

[2] We use **Necessary Condition** *("If Q then P" or "if not-P then not-Q")* to readily and logically prove:

a. First server of claim 6 is not a proxy server

Forwarding data *(P)* is a necessary condition of being a proxy server *(Q)*. If *(Q)* first server is a proxy for Web server, then *(P)* it sends or receives data with Web server and forwards the data.

In claim 6, as *(if not-P)* first server **never sends or receives any data with Web server**, so *(then not-Q)* we can assert that first server is not a proxy.

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b. the language of claim 6 can not be read as Diagram 1

If *(Q)* the language of claim 6 is read as Diagram 1, then *(P)* first server sends data to Web server (see data flow 2, Diagram 1), and first server receives data from Web server (see data flow 3, Diagram 1).

In claim 6, as *(if not-P)* first server **never sends any data to Web server** and **never receives any data from Web server**, so *(then not-Q)* we can assert that the language of claim 6 can not be read as Diagram 1.

[3] Proxy is part of LAN, but first server is part of Internet. Inside an organization, people may use proxy server to forward Internet data to computers which connect to a LAN, and the location of proxy server is inside the LAN, and world wide people outside the LAN are not able to access the proxy server. But first server of claim 6 allows access from world wide people, and is in "Internet".

2. Final Action (Claim Rejections – 35 USC 103)

According to the inventions of Carter in view of Hamzy, and Examiner's action "... Hamzy teaches that a proxy server is used to receive (1) a request from the user and then sends (2) the information to a web server which then sends (3) the stored document or information to the proxy server which can then sends (4) it to the printer to be printed, ..." we draw Diagram 1 to describe this communication, and add 1-4 to highlight data flows and mark them in Diagram 1.

According to our claim 6 "... first retrieve means for sending (1) said inputted number via Internet to a first server, which translates said number into the information of receiving a document from a second server via Internet and sends (2) said information to said printer, and for receiving said information; second retrieve means for, according to said received information, retrieving (3, 4) said document from said second server via Internet; ..." we draw Diagram 2 to describe this communication, and mark data flows 1-4 in Diagram 2.

In response to Examiner's reply in Advisory Action, we draw Diagram 2B to show the proxy server in claim 6; and for easily comparing with Diagram 2B, we further draw Diagram 1B that displays Diagram 1 in another format only. The proxy server, which is located inside LAN to forward data to Internet, is well-known network technology, and people skilled in the art know that our invention can work with or without proxy server (Diagram 2 and 2B), just based on the LAN configuration.
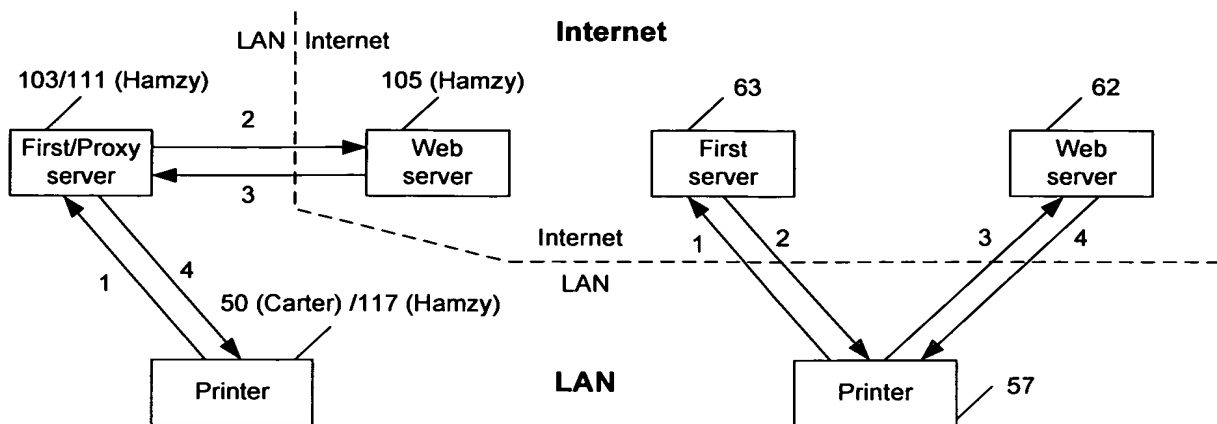
LAN ┆ Internet

Internet

103/111 (Hamzy)

```
           2
First/Proxy  ───────►  Web
server                  server
           3
```

105 (Hamzy)

1   4

50 (Carter) /117 (Hamzy)

LAN

Printer

Diagram 1 - Carter in view of Hamzy

Internet

63   62

```
First                    Web
server                   server
```

Internet
1   2   3   4
LAN

Printer   57

Diagram 2 – Claim 6

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105 (Hamzy)

```
           Web
           server
      2         3
```

Internet
LAN

```
First/Proxy
server
    1  4
```

103/111 (Hamzy)

Printer   50 (Carter) /117 (Hamzy)

Diagram 1B - Carter in view of Hamzy

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63   62

```
First                    Web
server                   server
```

1   2   3   4

```
Proxy
server
1  2  3  4
```

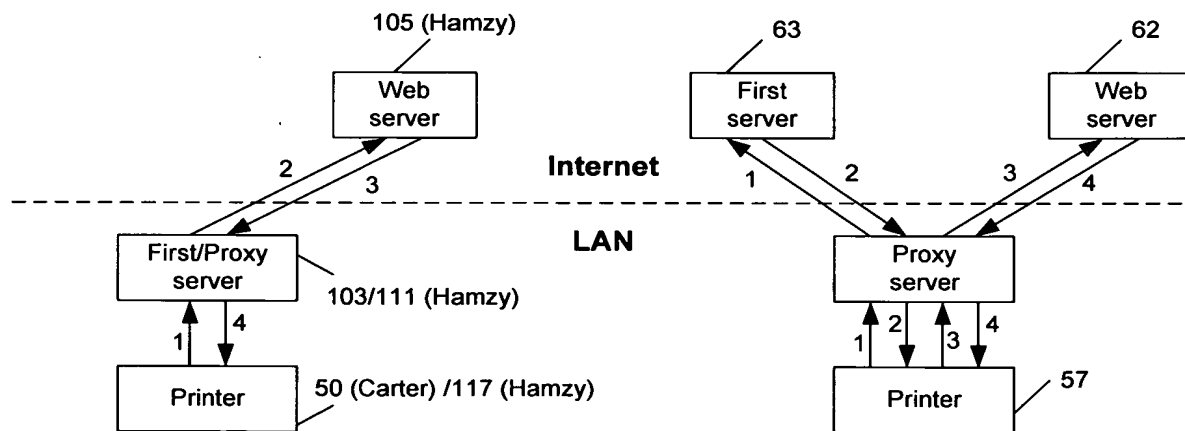Printer   57

Diagram 2B – Claim 6 (show proxy)

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Compare differences between invention of Carter in view of Hamzy and our claim 6:

Invention of Carter in view of Hamzy	Claim 6
How to print a webpage?	
See Examiner's action, to print a webpage, data flows 1-4 of Diagram 1 or 1B are: 1. Printer to First/Proxy server 2. First/Proxy server to Web server 3. Web server to First/Proxy server 4. First/Proxy server to Printer Difference: 1) Data flows 2,3 and 4 between Printer, First/Proxy server and Web server are different from ours. 2) Data flows 2-3, there are communications between First server and Web server, see column 4 lines 44-53 Fig. 2 3) Data flows 2-3, First server retrieves the page from Web server for client/Printer, see block 205/213 Fig 3 4) Not available 5) Not available	See claim 6, to print a webpage, data flows 1-4 of Diagram 2, or 2B (with proxy) are: 1. Printer to First server (or via Proxy) 2. First server to Printer (or via Proxy) 3. Printer to Web server (or via Proxy) 4. Web server to Printer (or via Proxy) Difference: 1) See comment in left column. As data flows are different, so data flows 1-4 used by claimed printer is not showed by Carter in view of Hamzy. 2) **No communication between First server 63 and Web server 62** 3) **First server 63 never receives any data from Web server 62** 4) Data flow 2, First server 63 sends the address (URL, title, etc.) of webpage to Printer. 5) Prompt title/password to users after data flows 1-2 and before executing flows 3-4, see claim 8 and page 10 lines 6.

From above comparing, we know:

1. First server 63 never sends or receives any data with Web server 62 (items 2-3). So First server 63 is not a proxy for Web server 62.

2. In our invention, there is no reason for Web server 62 to send data (document) to another **Internet** server 63 for the printer. So there is no object for First server 63 to be the proxy for Web server.

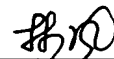3. Data flow of claim 6 follows **Diagram 2 and 2B**, instead of Diagram 1 or 1B.

Functions of Proxy server of Hamzy	Functions of First server 63 of claim 6
• Receive an **address** (http://www.ibm.com/, see column 4 line 42, Fig 2) of webpage from printer.	• Receive a **number** (3333-0000-1110, see bank account number, page 9 line 35) from printer.
• Retrieve the webpage at the address (http://www.ibm.com/ see column 4 line 47 Fig 2), see Fig 3, **block 205 retrieves webpage, which is further confirmed by reusing cached page at block 213 column 6 lines 28-32;** block 213 retrieves webpage.	• **Translate** the number to the address (URL, title, etc.) of a webpage (document).
• Send data **webpage** to client/printer (see blocks 207/215 Fig 3), and data size may be larger than 100k bytes (size of the page), to one skilled in the art.	• Send data **address of webpage** to printer, and data size is small (less than 1k bytes) see page 9 lines 13-14; page 10 lines 4-5.
• Print page to printer, see block213/215 Fig3	• Not print webpage to printer.
• Provide LAN service only; does not have the capability to support world wide printers.	• Provide Internet service; world wide printers, via **one** first server 63, print docs distributed in world wide servers 62.

From above comparing, we know in claim 6:

1. First server never sends or receives data from Web server.

2. Data sent from first server to printer is the address of target document, instead of the target document.

3. The function of first server is translating a number to the address (URL, title, etc.) of a document in Internet.

4. The first server provides translating service for world wide printers.

In conclusion, first server, including its function, communication method and object, is different from the proxy server of Carter in view of Hamzy.

Respectfully submitted,

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June 27, 2009

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Claims appendix

Claim 6 : A network printer connected to a network for printing a document in the Internet by a user, comprising:

a keypad unit for inputting a number from the user;

first retrieve means for sending said inputted number via Internet to a first server, which translates said number into the information of receiving a document from a second server via Internet and sends said information to said printer, and for receiving said information;

second retrieve means for, according to said received information, retrieving said document from said second server via Internet;

print means for printing said received document.

Claim 7: The network printer as claimed in claim 6, said information of receiving a document from a second server via Internet is at URL format.

Claim 8: The network printer as claimed in claim 6, wherein said information of receiving a document from a second server via Internet further includes the title of said document, and said network printer further comprising:

a display unit for displaying the title of said document, and prompting the user for confirmation before printing said document.